

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JOHN DOE,
Plaintiff,

v.

PRAIRIE VIEW A&M UNIVERSITY,
Defendant.

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CIVIL ACTION NO. 4:22-cv-01019

JURY DEMAND

**UNOPPOSED MOTION TO EXTEND SCHEDULING ORDER
DEADLINES**

Plaintiff, John Doe (“Plaintiff”), by and through counsel, files this Motion to Extend Scheduling Order Deadlines, and in support thereof, respectfully states the following:

1. The parties exchanged their Initial Disclosures in this case on January 27, 2023.
2. Currently, the discovery deadline is set for May 31, 2023. Plaintiff is proceeding diligently with discovery in this case, but due to family circumstances, Plaintiff’s counsel’s ability to travel is limited until mid-May 2023.
3. Both parties would prefer that the majority of depositions be conducted in person, rather than remotely via Zoom.
4. A 30-day extension of the case management deadlines would permit the parties to take depositions in person throughout May and June 2023.
4. This motion is made in good faith and not for purposes of delay.

5. The undersigned has conferred with counsel for Defendant concerning this Motion. It is unopposed.

6. Therefore, Plaintiff moves this Court to enter an amended scheduling order with the following deadlines:

- a) Discovery must be completed by: June 30, 2023
- b) Motion cut-off: July 31, 2023
- c) Joint Pretrial Order is due by: December 31, 2023
- d) Final Pretrial Conference is set for _____ p.m. on _____
- e. Trial is set for _____ a.m. on _____

Respectfully submitted,

ALLEN HARRIS PLLC

/s/ Samantha K. Harris

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been sent by ECF, on this the 22nd day of March, 2023, to all counsel of record.

/s/ Ramón A. Soto
RAMÓN A. SOTO